

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**Criminal No. SAG-20-065**

**JESSE MEARS**

**MOTION IN LIMINE TO CROSS-EXAMINE LAW ENFORCEMENT WITNESSES  
ABOUT PRIOR MISCONDUCT**

Jesse Mears moves this Court in limine to allow cross-examination at trial about certain prior acts identified in records of the Baltimore City Police Department. Mr. Mears has already moved as such, and argument as to why Mr. Mears is entitled to cross-examine the officers related to those prior acts were addressed therein. See ECF No. 49 & 58. The Court issued a letter order on October 27, 2020 permitting cross-examination at the pre-trial motions hearing in certain respects. See ECF No. 59. Preserving his ability to revise his position based on the outcome of the pre-trial motions hearing scheduled for March 10, 2021, Mr. Mears requests that the Court's ruling in ECF No. 59 likewise apply to trial for the reasons stated in Mr. Mears' prior motion in limine and reply. See ECF Nos. 49 & 58.

Respectfully submitted,

/s/

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